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**From:** James Doty [tchdconsultingllc@gmail.com]  
**Sent:** 10/4/2022 7:03:46 PM  
**To:** Chrissie Gubancsik [chrissie.gubancsik@la.gov]  
**CC:** Ethan Buckner [ebuckner@earthworksaction.org]; Rebekah Staub [rstaub@earthworksaction.org]; Chrystal Beasley [cbeasley@earthworksaction.org]; Kaitlyn Joshua [kjoshua@earthworksaction.org]; Roddy Hughes [roddy.hughes@sierraclub.org]; Courtney Naquin [courtney.naquin@sierraclub.org]; Naomi Yoder [naomi@healthygulf.org]; dustin@healthygulf.org; roishetta@healthygulf.org; James Hiatt [james@labucketbrigade.org]; Oren Jacoby [oren@storyville.org]; jon@oceans8films.com; Nance, Earthea [Nance.Earthea@epa.gov]; deqoec@la.gov; brian.tusa [brian.tusa@la.gov]; angela.marse [angela.marse@la.gov]; officesec@la.gov; nbirnbaun [Ex. 6 Personal Privacy (PP)]; Sam Jinishian [sam@storyville.org]; samae [Ex. 6 Personal Privacy (PP)]; Terrell, Kimberly A [kterrell1@tulane.edu]  
**Subject:** Re: Fwd:  
**Attachments:** LC & PA OGI Project Observations & Findings (Revised 092922).pdf

Ms. Gubancsik -

I hope that you are well.

It has now been more than 6-weeks since the LDEQ received optical gas imaging monitoring data described in the *Lake Charles, Louisiana and Port Arthur, Texas Area OGI Monitoring Project, Observations and Findings, June 20 - 23, 2022*, document provided on August 15. All relevant documentation was provided via email and in the hardcopy narratives and electric files that were received by you via USPS.

You were contacted and then responded to me on August 16 at 9:04 AM stating that you were "..... currently working with our various stakeholders to formulate a response for you. If you have any questions in the meantime, please feel free to contact me at your convenience."

I have not heard from you and/or the LDEQ since you sent me that August 16 communication. This is a bit troubling considering the real-time field assessments documented significant industrial and hydrocarbon emissions being continuously released in the Lake Charles area without regard to human health, climate change, site operations and maintenance, and permit representations.

In the meantime, as the documented findings have been more thoroughly processed and studied, it has been noted that the observations previously attributed to Commonwealth LNG were actually emitted by the Venture Global - Calcasieu Pass LNG facility. Consequently, the *Lake Charles, Louisiana and Port Arthur, Texas Area OGI Monitoring Project, Observations and Findings, June 20 - 23, 2022*, document was revised on September 29 to reflect this update. Please refer to the enclosed document.

In the meantime, affected parties are anxious to hear about LDEQ activities and responses related to the June 2022 findings including but not limited to those in close proximity to environmental justice areas, thus I am contacting you again as previously suggested.

I look forward to coordinating with you on these important matters in the near future.

Thanks!

On Tue, Aug 16, 2022 at 9:04 AM Chrissie Gubancsik <[Chrissie.Gubancsik@la.gov](mailto:Chrissie.Gubancsik@la.gov)> wrote:

Mr. Doty-

Thank you for sending this information. I am currently working with our various stakeholders to formulate a response for you. If you have any questions in the meantime, please feel free to contact me at your convenience.

Chrissie Gubancsik

CHRISSIE GUBANCSIK

Regional Manager, Southwest Regional Office

Louisiana Department of Environmental Quality

Phone: 337.491.2756

Fax: 337.491.2682



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**From:** James Doty <[tchdconsultingllc@gmail.com](mailto:tchdconsultingllc@gmail.com)>

**Sent:** Monday, August 15, 2022 11:25 PM

**To:** \_DEQ-SWROAdmin <[\\_DEQ-SWROAdmin@LA.GOV](mailto:_DEQ-SWROAdmin@LA.GOV)>

**Cc:** Ethan Buckner <[ebuckner@earthworksaction.org](mailto:ebuckner@earthworksaction.org)>; Rebekah Staub <[rstaub@earthworksaction.org](mailto:rstaub@earthworksaction.org)>; Chrystal Beasley <[cbeasley@earthworksaction.org](mailto:cbeasley@earthworksaction.org)>; Kaitlyn Joshua <[kjoshua@earthworksaction.org](mailto:kjoshua@earthworksaction.org)>; Roddy Hughes <[roddy.hughes@sierraclub.org](mailto:roddy.hughes@sierraclub.org)>; Courtney Naquin <[courtney.naquin@sierraclub.org](mailto:courtney.naquin@sierraclub.org)>; [naomi@healthygulf.org](mailto:naomi@healthygulf.org);

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**Subject:** Fwd:

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Ms. Gubancsik –

I hope that this communication finds you well.

I am writing to you on behalf of my client, Earthworks, regarding findings and observations documented on the recent Lake Charles, Louisiana and Port Arthur, Texas Area Optical Gas Imaging (OGI) Monitoring Project that was in part conducted in the Lake Charles, Louisiana area from June 20 – 21, 2022. As you may know, Earthworks is a non-profit organization that stands for clean air, water, and land, healthy communities, and corporate accountability. They work for solutions that protect both the Earth's resources and its communities.

Earthworks is a non-governmental organization (NGO) that works to expose the health, environmental, economic, social, and cultural impacts of energy extraction through work informed by sound science, thus they reached out to me, Tim Doty, President of TCHD Consulting LLC (TCHD) in Driftwood, Texas. TCHD is a company that specializes in technical, environmental, safety, and thermography solutions for a variety of clients in the United States, Canada, and Europe.

Emissions that are invisible to the human eye were made visible by using a Teledyne FLIR GF320 OGI camera that detects hydrocarbon in the 3.2 – 3.4 micrometer range, and thus Lake Charles area air emission sources were visually identified on this most recent ambient air environmental project. Obviously, the LDEQ fills comfortable with using this remote-sensing technology, as it is approved and currently used by the EPA and other regulatory agencies around the country and because the LDEQ itself currently owns multiple OGI cameras equivalent to the one used during this project. OGI surveys were conducted on land and focused on identifying emissions sources and characterizing potential impacts for communities that are near and adjacent to these industrial sites including some potential environmental justice areas.

I visited many sites in Cameron Parish and Calcasieu Parish and documented excessive emissions from ten different facilities in the Lake Charles area including but not limited to Cheniere – Sabine Pass LNG, Venture Global – Calcasieu Pass LNG, Sempa – Cameron LNG, Commonwealth LNG, Louisiana Pigment Company,

Westlake Chemical – Lake Charles Polymer Plant, Sasol – Lake Charles Chemical Complex, Citgo – Lake Charles Manufacturing Complex, Firestone Polymers, and Phillips 66 – Lake Charles Manufacturing Complex. Physical locations of these complaints are included on the embedded global positioning coordinates in the videos and/or on the location descriptors on the entry slides on each provided video.

Emission sources were varied and included but were not limited to flares, vent pipes, exhaust stacks, and storage tanks. Observations and findings were documented in 21 OGI videos that are being provided to the LDEQ so that investigations can be conducted. Emissions were excessive in the Lake Charles area, as described in the *Lake Charles, Louisiana and Port Arthur, Texas Area OGI Monitoring Project, Observations and Findings, June 20 - 23, 2022*, document that is also being provided. And finally, I am certifying that I personally collected the documentation associated with these air complaints.

Emissions were plentiful and were not difficult to detect even adjacent to residential areas. It is interesting to note that after a bit of research on nearby ambient air monitoring stations in the Lake Charles area only two are in close vicinity of the heavy industrial areas. The LDEQ Westlake, Louisiana site that is located at 2646 John Stine Road was established on September 28, 1992, and characterizes sulfur dioxide, particulate matter equal to or less than 2.5 microns, oxides of nitrogen, and volatile organic compounds by triggered canister. This monitoring station seems to be in an ineffective location for monitoring many nearby industries particularly considering the predominant southerly wind flow path is physically blocked by trees per the online picture. Moreover, the Lake Charles – Lighthouse Lane air monitoring site that was established on July 10, 2002, and collects event-triggered canister samples is even located in a worse spot as the online pictures show that the wind flow is blocked from the north, east, and south. How does the LDEQ conclude that it is collecting representative downwind industrial samples when wind flow is physically blocked per its own documentation?

Among the big emitters in the Lake Charles area were four liquid natural gas (LNG) processing facilities led by the Cheniere – Sabine Pass LNG who was emitting a tremendous quantity of emissions from at least 30 exhaust stacks that were actively filling the horizon with uncombusted hydrocarbon. Excessive exhaust stack emissions were a common theme on this project and included the Louisiana Pigment Company's long streaming plume that was visual to the bare eye. Its magnitude was made even more visible in the OGI high-sensitivity mode as it was heading toward nearby residential areas. Excessive exhaust stack emissions were also documented at the Firestone Polymers and Westlake Chemical – Lake Charles Polymer Plant facilities.

The Lake Charles area also had several poorly combusting flares that were documented by this project. One of the three Westlake Chemical – Lake Charles Polymer Plant's flares was not combusting efficiently per its OGI profile that was documented on the morning of June 21. It was releasing excess emissions from a flare tip that did not appear to have a hot combustion zone which is indicative of a poorly functioning combustion device that does not meet permit representations and manufacturer design expectations. Another poorly combusting flare was also identified at the Sasol – Lake Charles Complex early on the morning of June 21.

And finally, the Citgo – Lake Charles Manufacturing Complex was also a consistent source of excessive emissions, as it had several vent and exhaust stacks that were steadily releasing significant hydrocarbon, along with a poorly combusting steam-assisted vertical flare stack that was on-site. Additional excess hydrocarbon

emissions were also documented being released from multiple Citgo storage tanks and from some five storage tanks at the Phillips 66 – Lake Charles Manufacturing Complex. Emissions from these sources were not typical of the source types and likely exceeded permit representations and are indicative of poorly maintained infrastructure.

As a result of documented findings, it is recommended that the LDEQ conduct mobile monitoring activities to characterize and measure downwind and airshed pollutants in an effort to minimize emissions and to characterize impacts to local communities. I look forward to collaborating with you and the LDEQ in resolving these significant industrial and hydrocarbon emissions that are being continuously released in the Lake Charles area without regard to human health, climate change, site operations and maintenance, and permit representations. In the meantime, please help these local communities out by providing environmental assistance to areas that currently need support.

Hardcopies of the enclosed documents and an SD card with unedited OGI videos, digital photos, and YouTube-posted edited videos have been mailed to you.

Please feel free to contact me directly regarding these matters and any questions that you may have, as I am requesting follow-up on inspector findings.

### **Technical Background**

TCHD Consulting LLC is located in Driftwood, Texas and provides technical, environmental, safety, and thermography consulting services to a variety of customers in the United States, Canada, and Europe. Mr. Tim Doty worked for the Texas Commission on Environmental Quality (TCEQ) for +28 years and served as the Agency's mobile air monitoring manager and technical expert that included management of up to 20 staff members for 17 years. He performed and managed ambient air monitoring and environmental assessments that were conducted both inside and outside of many hundreds of industrial facilities, oil and natural gas sites, and landfills that included EPA interaction and expert witness testimony. He also managed the TCEQ's Mobile Response Team and all the Agency's emergency response assets for two years and has planned/managed/participated on many manmade and natural disaster responses including but not limited to: Helotes Compost Fire, Corpus Christi Benzene Seep, Hurricane Katrina, Hurricane Rita, Hurricane Ike, Lubbock Dump Fire, 2011 Super Bowl, Bastrop Fires, Wimberley Floods, Magnablend Industrial Explosion, Hurricane Harvey, and the COVID-19 Pandemic.

Mr. Doty is a certified Infrared Training Center Level III thermographer that provided thermography and OGI instruction to some +150 TCEQ staff members after helping to establish OGI field uses and policies within the TCEQ from 2005 - 2018. He also served as a technical advisor to the TCEQ Director of Compliance and Enforcement. He now provides technical, air monitoring, environmental assessments, and OGI and general thermography consulting services, including instruction, to both students and relevant parties including but not limited to those associated with industry, oil and natural gas, environmental causes, safety, the public interest, and the media.

Sincerely,

Tim Doty

<https://youtu.be/ORpPV6JOQow>

<https://youtu.be/Zc5M30usXss>

<https://youtu.be/qSaMieGUn-U>

<https://youtu.be/PUmkS3LZWGE>

<https://youtu.be/ypS5y3IGVLM>

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[https://youtu.be/CO8vKpAGQ\\_I](https://youtu.be/CO8vKpAGQ_I)

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Owner/Manager

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